

Corey D. Riley (16935)
Deiss Law PC
10 West 100 South, Suite 425
Salt Lake City, Utah 84101
(801) 433-0226
criley@deisslaw.com

Nicholas A. Lutz (51299 - Colorado)
(appearing *pro hac vice*)
Rathod Mohamedbhai LLC
2701 Lawrence Street, Suite 100
Denver, Colorado 80205
(303) 578-4400
nl@rmlawyers.com

Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DISTRICT**

ESTATE OF PATRICK HARMON
SR.;
PATRICK HARMON II, as Personal
Representative of the Estate of
Patrick Harmon Sr., and heir of
Patrick Harmon Sr.,
TASHA SMITH, as heir of Patrick
Harmon Sr.,

Plaintiffs,

v.

SALT LAKE CITY, a municipality;
and
OFFICER CLINTON FOX, in his
individual capacity,

Defendants.

**STIPULATED MOTION FOR
EXTENSION OF TIME TO FILE
ATTORNEY PLANNING
MEETING REPORT AND
PROPOSED SCHEDULING
ORDER**

Case No. 19-cv-00553-HCN-CMR

Judge Howard C. Nielson, Jr.

Magistrate Judge Cecilia M. Romero

Plaintiffs Estate of Patrick Harmon Sr., Patrick Harmon II, and Tasha Smith (together, “Plaintiffs”) and defendants Salt Lake City and Clinton Fox hereby stipulate and move the Court to extend the time for the Parties to file their Attorney Planning Meeting Report and Proposed Scheduling Order. The Parties’ report and proposed order are currently due on December 30, 2021. Undersigned counsel met and conferred telephonically on December 29, 2021, regarding the proposed scheduling order and discovery plan. Undersigned counsel requires additional time to confer on certain discovery matters, including a coordinated discovery plan with a separate, but related case. Undersigned counsel believes that with additional conferral, the parties can reach a fulsome agreement and proposed order. Therefore, undersigned counsel stipulates and requests an extension of the deadline to file the parties’ Attorney Planning Meeting Report and Proposed Scheduling Order of six (6) calendar days, up to and including January 5, 2021. The extension is not requested for an improper purpose and will not unduly delay resolution of this action. A proposed order granting this stipulated motion is filed contemporaneously herewith.

DATED: December 30, 2021.

DEISS LAW P.C.

SALT LAKE CITY

/s/ Corey D. Riley

/s/ (signed with permission)

Corey D. Riley

Katherine R. Nichols

Nicholas A. Lutz

Attorney for Defendants

Attorneys for Plaintiffs